

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NORTH DAKOTA

UNITED STATES OF AMERICA,

Plaintiff,

v.

\$42,200 IN UNITED STATES
CURRENCY,

Defendant.

Case No.

VERIFIED COMPLAINT FOR FORFEITURE

Plaintiff, United States of America, brings this complaint and alleges as follows in accordance with Supplemental Rule G(2) of the Federal Rules of Civil Procedure:

NATURE OF THE ACTION

1. This is a civil forfeiture action *in rem* to forfeit property subject to forfeiture pursuant to 21 U.S.C. § 881(a)(6) for the forfeiture of property which constitutes money furnished or intended to be furnished by a person in exchange for a controlled substance, or proceeds traceable to such an exchange, or money used to facilitate a violation of 21 U.S.C. §§ 801 *et seq.*

THE DEFENDANT IN REM

2. The Defendant Property consists of \$42,200 in United States currency. Defendant Property was seized on October 8, 2022, from Korbin Robert Goodroad on I-94 in Cass County, North Dakota, and has been deposited in the Asset Forfeiture Fund, U.S. Treasury.

JURISDICTION AND VENUE

3. The United States brings this action *in rem* in its own right to forfeit and condemn Defendant Property. This Court has jurisdiction over an action commenced by the United States under 28 U.S.C. § 1345, and over an action for forfeiture under 28 U.S.C. § 1355(a).

4. This Court has *in rem* jurisdiction over the Defendant Property pursuant to 28 U.S.C. § 1355(b) and 18 U.S.C. § 981.

5. Venue is proper in this district pursuant to 28 U.S.C. § 1355(b)(1) because acts or omissions giving rise to the forfeiture occurred in this district.

BASIS FOR FORFEITURE

6. The facts and circumstances supporting the seizure and forfeiture of the defendant property are contained in the attached Declaration of Special Agent Dylan Anthony, which is reincorporated here as if alleged herein, and requires a responsive pleading to each separate averment contained therein.

7. The Defendant Property constitutes property furnished or intended to be furnished by a person in exchange for a controlled substance, or proceeds traceable to such an exchange, or property used to facilitate a violation of 21 U.S.C. §§ 801 *et seq.* and is subject to forfeiture pursuant to 21 U.S.C. § 881(a)(6).

CLAIM FOR RELIEF

WHEREFORE, the United States of America respectfully requests that a Warrant and Summons for Arrest of Articles *In Rem* be issued for the \$42,200.00 in United

States Currency; that due notice be given to all parties to appear and show cause why the forfeiture should not be decreed; that judgment be entered declaring the defendant property to be forfeited to the United States of America for disposition according to law; and that the United States of America be granted such other and further relief as this Court may deem just and proper, together with the costs and disbursements of this action.

Dated: March 20, 2023

MAC SCHNIEDER
United States Attorney

By: /s/ Matthew D. Greenley
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VERIFICATION

I am a Task Force Officer with the Drug Enforcement Administration and I am the agent assigned the responsibility for this case. I have read the contents of the foregoing complaint for forfeiture and the attachment thereto, and the statements contained therein are true to the best of my knowledge and belief.

I hereby verify and declare under penalty of perjury pursuant to 28 U.S.C. § 1746 that the foregoing is true and correct.

Dated: March 20, 2023

A handwritten signature in black ink, appearing to read 'Dylan Anthony', is written over a horizontal line.

DYLAN ANTHONY, Special Agent
Drug Enforcement Administration